

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

JOSE M. LORIE VELASCO, et al,
Plaintiffs,

vs.

KMART CORPORATION, et al,
Defendants,

vs.

GROUP SERVICE SYSTEM,
COOPERATIVA DE SEGUROS
MULTIPLES DE PUERTO RICO
GROUP SERVICE SYSTEM,
Third Party Defendants.

CIVIL NO.: 1998-1867 (PG)

**MOTION REQUESTING EXTENSION OF TIME TO FILE OPPOSITION TO SUMMARY
JUDGMENT FILED BY THIRD-PARTY DEFENDANTS**

TO THE HONORABLE COURT:

COMES NOW Defendant Kmart Corporation, represented by the undersigned attorneys, and respectfully alleges and prays:

1. On September 17, 2001 (Docket No. 155) the Third-Party Defendants Group Service System and Cooperativa de Seguros Múltiples de Puerto Rico filed a Motion for Summary Judgment.
2. The case was stay because of Kmart Bankruptcy filling. On February 17, 2004 after a lift of stay was granted, the case was reopen.
3. On March 31, 2004 the United State Magistrate Judge Aida M. Delgado Colón granted Kmart until April 15, 2004 to response the Third Party Defendants' Motion for Summary Judgment (Docket No. 192).

4. As mentioned before this case was stay for more than two years, it consist of a considerable amount of documentary evidence and thus the appearing party request an extension of time to file the opposition, so it can conclude the review of the extensive documentary evidence.

5. For the reasons stated before, the appearing party respectfully request an extension of 15 days to filed its opposition to the Motion for Summary Judgment.

WHEREFORE, it is respectfully requested from this Honorable Court requesting 15 days, until April 30, 2004, to oppose the Motion for Summary Judgment.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 15th day of April 2004.

IT IS HEREBY CERTIFIED that on April 15, 2004, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: **José Quetglas Jordán, Esq.**, Quetglas Law Office, P.O. Box 16606, San Juan, Puerto Rico, 00907-6606, and to **Vicente Santori Coll, Esq.**, PO Box 363073, San Juan, Puerto Rico 00936.

s/Marta E.Vila Baez
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